

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

M.A.,)
v. Plaintiff,)
WALL TOWNSHIP BOARD OF)
EDUCATION,)
Defendant.)
Case No. 3:20-cv-05218-FLW-LHG
Judge: Freda L. Wolfson
Magistrate: Lois H. Goodman

SUPPLEMENTAL CERTIFICATION OF ROBERT C. THURSTON, ESQ.

I, Robert C. Thurston, Esq., declare and certify as follows:

1. I am an attorney at law, admitted to practice before this Court and co-counsel of record for Plaintiff in this matter.

2. I make this certification based on my own personal knowledge and am capable of testifying to all of the facts contained herein if called upon to do so.

3. The purpose of this Supplemental Certification is to amend and supplement the pending fee petition (ECF #33) filed with the Court on February 11, 2022. Plaintiffs incorporate by reference herein the original fee petition and all supporting documents as if set forth in full, except regarding the invoices referenced below.

4. Attached please find a true and correct copy of the invoices of John Rue & Associates (“JRA”), with only confidential and privileged information¹ redacted, which

¹ This includes information protected under Rules 5.2 (privacy), 26(b)(1) (attorney-client privilege), and 26(b)(3) (attorney work product).

represents \$173,179.50 in attorney's fees² and \$412.00 in costs for a current **total of \$173,591.50** as of this filing. (Exhibit A.)

5. Attached please find a true and correct copy of the invoices of Thurston Law Offices LLC of all time incurred since January 8, 2022 (*see fn. 2*), which represents \$25,310.00 in attorney's fees³ and \$0.00 in costs for a current **total of \$25,310.00** as of this filing. (Exhibit B.)

6. Plaintiffs hereby amend paragraph D of the *ad damnum* clause of fee petition to a **total of \$198,901.50** as of this filing.

Dated: November 23, 2022

By: 
Robert C. Thurston, Esq.

² JRA's invoices include time incurred by Thurston Law Offices LLC through January 8, 2022.

³ JRA's invoices include time incurred by Thurston Law Offices LLC through January 8, 2022.

John Rue & Associates, LLC

EXHIBIT A

100 Overlook Center 2nd Floor #9211

Princeton, NJ 08540

Phone: 862-283-3155 | Fax: 973-860-0869

PRE-BILL

D
Privileged Attorney-Client Communication
Privileged Attorney-Client Communication
United States

Invoice Date: November 10, 2022

Invoice Number: Pre-bill

Invoice Amount: \$173,591.50

Matter: A Flat Fee

Attorney's Fees

6/12/2018	Review client email; attend to strategy concerning same; review draft mediation request; phone call with client (D. A.) re: Mediation Request; review Mediation Request per client comments; draft email to client with comment and instructions regarding Mediation Request	D.S.	\$440.00	1.70	\$748.00
6/13/2018	Attention to mediation request.	J.D.R.	\$495.00	2.50	\$1,237.50
6/13/2018	Phone call with client; revise draft Mediation Request; draft email to client sending same to client; work with client to obtain fax copy fo signed mediation Request; clean up and file same; finalize Rue letter to adversary counsel re: service of Mediation Request	D.S.	\$440.00	2.30	\$1,012.00
6/22/2018	Review mediation scheduling email; attend to same	D.S.	\$440.00	.30	\$132.00
6/24/2018	Email communications re mediation confirmation.	J.D.R.	\$495.00	.20	\$99.00

6/25/2018	Attention to scheduling; client communications re same; attention to confirmation of mediation request; attention to DOE communication re same.	J.D.R.	\$495.00	.50	\$247.50
6/25/2018	Review file re: acknowledgment of mediation and scheduling; draft email to client re: same	D.S.	\$440.00	.30	\$132.00
6/25/2018	Attention to email correspondence re in-office meeting and upcoming mediation	L.G.	\$220.00	.50	\$110.00
6/26/2018	Exchange emails with Mediation scheduler and adversary counsel; draft "Parent Authorization" letter	D.S.	\$440.00	.60	\$264.00
6/29/2018	Review scheduling emails; draft email to client re: same and to set up a meeting; review revised Mediation Notice and forward same to client	D.S.	\$440.00	.30	\$132.00
7/5/2018	Review Voicemail from client; draft email response to same; attend to same	D.S.	\$440.00	.40	\$176.00
7/10/2018	Attention to in-office meeting with client	L.G.	\$220.00	4.50	\$990.00
7/10/2018	Client Meeting to prepare for Mediation	D.S.	\$440.00	4.30	\$1,892.00
7/31/2018	Prepare for Mediation	D.S.	\$440.00	1.00	\$440.00
8/1/2018	Preparation for mediation	J.D.R.	\$495.00	2.20	\$1,089.00
8/1/2018	Attention to discussion and review of meeting notes and transcript with DS in preparation for mediation	L.G.	\$220.00	2.00	\$440.00
8/1/2018	Prepare for Mediation, including preparation of grade-change proposal and issue list; phone call with client	D.S.	\$440.00	5.30	\$2,332.00
8/2/2018	Attend Mediation and related travel	D.S.	\$440.00	4.80	\$2,112.00

8/2/2018	Draft email to client	D.S.	\$440.00	.90	\$396.00
8/2/2018	Mediation at Wall Township BOE; travel	J.D.R.	\$495.00	5.00	\$2,475.00
9/12/2018	Review hearing notice; email to adversary; draft adjournment request	D.S.	\$440.00	.30	\$132.00
9/12/2018	Finalize/fax letter; follow-up call to client re: adjournment	D.S.	\$440.00	.30	\$132.00
9/13/2018	Phone calls to OAL to confirm adjournment; email to adversary	D.S.	\$440.00	.10	\$44.00
9/18/2018	Email to client; email to adversary	D.S.	\$440.00	.50	\$220.00
9/24/2018	Review client voicemail and notes re: same; leave detailed voicemail to client; prepare for Settlement Conference	D.S.	\$440.00	1.40	\$616.00
9/25/2018	Attend to strategy for Settlement Conference; prepare for same; phone call from client; complete notes for client review; draft email to client	D.S.	\$440.00	3.40	\$1,496.00
9/26/2018	Phone call from client	D.S.	\$440.00	.30	\$132.00
9/27/2018	Phone call with client; prepare for conference; attend OAL Settlement Conference in Trenton, NJ (also attend scheduling conference with trial judge); related travel; confer internally re: same	D.S.	\$440.00	6.40	\$2,816.00
9/27/2018	Preliminary research on judge; draft email to client re: schedule, etc.	D.S.	\$440.00	.40	\$176.00
11/29/2018	TC with DAS to discuss case	L.Q.	\$440.00	.20	\$88.00

11/29/2018	RESEARCH SOL exemptions and revision of student records	L.Q.	\$440.00	2.00	\$880.00
11/29/2018	Review documents from file	L.Q.	\$440.00	.40	\$176.00
11/29/2018	DRAFT Memo to file re: SOL	L.Q.	\$440.00	1.30	\$572.00
12/3/2018	Research statute of limitations	L.Q.	\$440.00	.75	\$330.00
12/3/2018	File review - to determine issues and comparison of facts with district policies	L.Q.	\$440.00	1.50	\$660.00
12/3/2018	Review file and personal notes and provide copy of most recent H.S. Transcript to L. Quartarolo	D.S.	\$440.00	.40	\$176.00
12/3/2018	Respond to request from L. Quartarolo re: Due Process Petition	D.S.	\$440.00	.30	\$132.00
12/4/2018	DRAFT Memo to file with updated information	L.Q.	\$440.00	1.50	\$660.00
12/5/2018	File Review	L.Q.	\$440.00	.30	\$132.00
12/5/2018	Meeting with DAS - response to brief expected 12/14	L.Q.	\$440.00	.35	\$154.00
12/6/2018	Review Audio of IEP meeting and take notes	L.Q.	\$440.00	1.30	\$572.00
12/6/2018	File review for documents	L.Q.	\$440.00	.50	\$220.00
12/7/2018	TC with DAS and Sean re: documents needed from files and from client	L.Q.	\$440.00	.60	\$264.00

12/7/2018	File Review for documents	L.Q.	\$440.00	.75	\$330.00
12/7/2018	Analyze case file and calendar; draft detailed email to client re: upcoming motion	D.S.	\$440.00	1.10	\$484.00
12/7/2018	Pulling A ^{PrmPrivileged Attorney} files for Don.	S.D.	\$165.00	1.30	\$214.50
12/7/2018	Call w Don/Lisa re: IEPs.	S.D.	\$165.00	.80	\$132.00
12/7/2018	Locating/Sorting IEPs for scanning.	S.D.	\$165.00	.70	\$115.50
12/7/2018	IEP Document review.	S.D.	\$165.00	.40	\$66.00
12/7/2018	Sharepoint document review	S.D.	\$165.00	1.00	\$165.00
12/7/2018	Scanning IEP Docs.	S.D.	\$165.00	1.40	\$231.00
12/7/2018	IEP Document review.	S.D.	\$165.00	1.10	\$181.50
12/7/2018	Uploading IEP docs, e-mail to Don/Lisa re: next steps.	S.D.	\$165.00	.50	\$82.50
12/7/2018	Scanning Correspondence files.	S.D.	\$165.00	.50	\$82.50
12/10/2018	Review of information in IEPs from 2013-2017 and notes of recommendations made in IEPs	L.Q.	\$440.00	1.75	\$770.00
12/10/2018	TC with DAS	L.Q.	\$440.00	.20	\$88.00

12/10/2018	DRAFT chart of recommendations from IEPs	L.Q.	\$440.00	.50	\$220.00	
12/10/2018	Scanning A <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small>	Correspondence Docs.	S.D.	\$165.00	.20	\$33.00
12/10/2018	Correspondence Docs Review.		S.D.	\$165.00	.30	\$49.50
12/10/2018	Scanning Correspondence Docs.		S.D.	\$165.00	.40	\$66.00
12/10/2018	Scanning Correspondence Docs.		S.D.	\$165.00	1.00	\$165.00
12/10/2018	Scanning Correspondence Docs.		S.D.	\$165.00	.40	\$66.00
12/10/2018	Scanning Correspondence Docs.		S.D.	\$165.00	.50	\$82.50
12/11/2018	File Review	L.Q.	\$440.00	1.00	\$440.00	
12/11/2018	Sending Lisa e-mail re: A <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small> n files, uploading correspondence docs.	S.D.	\$165.00	.10	\$16.50	
12/11/2018	Scanning E-mail Docs.	S.D.	\$165.00	.70	\$115.50	
12/11/2018	Formatting Correspondence scans.	S.D.	\$165.00	.70	\$115.50	
12/11/2018	Correspondence scans Review.	S.D.	\$165.00	.20	\$33.00	
12/11/2018	Correspondence scans review.	S.D.	\$165.00	.40	\$66.00	

12/11/2018	Searching for Documents requested by Lisa.	S.D.	\$165.00	1.00	\$165.00
12/12/2018	Uploading Lisa's requested docs.	S.D.	\$165.00	.10	\$16.50
12/12/2018	Consult with DAS	L.Q.	\$440.00	.30	\$132.00
12/12/2018	Review relevant docs with paralegal for adding to file	L.Q.	\$440.00	.20	\$88.00
12/12/2018	Review files (hard copy) received from District and mark relevant documents to be scanned	L.Q.	\$440.00	2.00	\$880.00
12/12/2018	Confer with L. Quartarolo re: documents and strategy	D.S.	\$440.00	.30	\$132.00
12/12/2018	Scanning Evaluations Docs.	S.D.	\$165.00	.60	\$99.00
12/12/2018	A <small>Privileged Attorney-CI</small> Evaluation Docs Review, e-mail to Lisa re: document location.	S.D.	\$165.00	.90	\$148.50
12/12/2018	Scanning Lisa's requested Docs, Review.	S.D.	\$165.00	1.20	\$198.00
12/12/2018	Review/Formatting Lisa's requested Docs.	S.D.	\$165.00	.40	\$66.00
12/13/2018	Review hardcopy files from previous attorney	L.Q.	\$440.00	2.00	\$880.00
12/13/2018	Create timeline of key events from 2015-2017	L.Q.	\$440.00	.50	\$220.00
12/13/2018	Update grid and background information in preparation for reponse to motion and due process petition	L.Q.	\$440.00	.50	\$220.00

12/13/2018	Phone calls to/from D [REDACTED] Attorney [REDACTED] re: defense of anticipated dispositive motion	D.S.	\$440.00	.40	\$176.00
12/13/2018	Scanning School work/faculty correspondence Docs.	S.D.	\$165.00	1.40	\$231.00
12/13/2018	Faculty correspondence/school work review/uploading.	S.D.	\$165.00	.50	\$82.50
12/14/2018	Trial Docs. Review	S.D.	\$165.00	.50	\$82.50
12/14/2018	Trial Docs Review	S.D.	\$165.00	.50	\$82.50
12/14/2018	Review calendar and draft email to adversary re: service of MSD	D.S.	\$440.00	.30	\$132.00
12/14/2018	Scanning Legal Correspondence Docs.	S.D.	\$165.00	1.90	\$313.50
12/14/2018	Legal Correspondence Review/Uploading.	S.D.	\$165.00	.80	\$132.00
12/14/2018	Scanning Progress Reports Docs.	S.D.	\$165.00	1.30	\$214.50
12/14/2018	Progress Report Docs. Review/Uploading.	S.D.	\$165.00	.50	\$82.50
12/14/2018	Scanning Trial Docs.	S.D.	\$165.00	1.20	\$198.00
12/14/2018	Scanning Trial Docs.	S.D.	\$165.00	.70	\$115.50
12/17/2018	Attention to emails from adversary	D.S.	\$440.00	.20	\$88.00

12/17/2018	Review District Motion for Partial SJ and cited case law	L.Q.	\$440.00	.50	\$220.00
12/17/2018	Review remainder of documents scanned from student files	L.Q.	\$440.00	1.00	\$440.00
12/17/2018	A <small>Privileged Attorney-CI</small> <small>Privileged Attorney-CI</small> <small>Privileged Attorney-CI</small> <small>Privileged Attorney-CI</small> Trail Docs Review.	S.D.	\$165.00	.90	\$148.50
12/17/2018	A <small>Privileged Attorney-CI</small> <small>Privileged Attorney-CI</small> <small>Privileged Attorney-CI</small> <small>Privileged Attorney-CI</small> Trial Docs Review/Uploading.	S.D.	\$165.00	.90	\$148.50
12/18/2018	Organize documents re: HI, grades, dr, notes and identify missing documents	L.Q.	\$440.00	2.00	\$880.00
12/18/2018	Attend to strategy for addressing District's MSD	D.S.	\$440.00	.20	\$88.00
12/18/2018	STatus TC with JDR and DAS	L.Q.	\$440.00	.20	\$88.00
12/20/2018	Complete Review of File and flag documents/question for DAS discussion with client	L.Q.	\$440.00	2.00	\$880.00
1/2/2019	Review/respond to internal email re: facts; review/revise draft email to client; send email to client, including copy of motion papers	D.S.	\$485.00	.80	\$388.00
1/2/2019	Review legal correspondence and highlight facts for amended DP	L.Q.	\$440.00	1.00	\$440.00
1/3/2019	Review L. Quartarola email re: SOL; respond to same	D.S.	\$485.00	.10	\$48.50
1/3/2019	Research and draft Response to Motion to Dismiss - section on SOL	L.Q.	\$440.00	2.50	\$1,100.00
1/4/2019	Phone call from C. Lavery; draft email to adversary re: Proof of Attendance [total time divided between two matters]	D.S.	\$485.00	.30	\$145.50

1/4/2019	Draft Response to Motion to Dismiss and amended DP - align with mediation request	L.Q.	\$440.00	3.00	\$1,320.00
1/4/2019	internal consultation with SD re: documents	L.Q.	\$440.00	.25	\$110.00
1/7/2019	Research - KOSHK cases	L.Q.	\$440.00	.50	\$220.00
1/7/2019	File managment - scan and file legal correspondence	L.Q.	\$440.00	.50	\$220.00
1/7/2019	DRAFT Response to Motion to Dismiss	L.Q.	\$440.00	2.50	\$1,100.00
1/8/2019	Research - esatblishing KOSHK date	L.Q.	\$440.00	.70	\$308.00
1/8/2019	File review and draft amended DP petition - failure to implement	L.Q.	\$440.00	3.00	\$1,320.00
1/9/2019	Research scope of approriate remedy under IDEA	L.Q.	\$440.00	.50	\$220.00
1/9/2019	Draft Amended DP petition - Requested Relief	L.Q.	\$440.00	1.00	\$440.00
1/10/2019	Correspondence to client to request documents needed for amended DP	L.Q.	\$440.00	.25	\$110.00
1/10/2019	Internal discussions; call with Mr. Lavery.	J.D.R.	\$495.00	1.50	\$742.50
1/10/2019	DRAFT due Process Petition and note areas for client input	L.Q.	\$440.00	2.00	\$880.00
1/14/2019	Complete amended DP petition and response brief	L.Q.	\$440.00	1.50	\$660.00

1/18/2019	Review draft opposition to motion and draft due process petition; begin to revise same	D.S.	\$485.00	3.00	\$1,455.00
1/23/2019	Revise amended DP petition (without client input due to lack of response)	L.Q.	\$440.00	1.00	\$440.00
1/23/2019	Review/revise draft due process petition; work with L. Quartarolo re: same; draft email to client forwarding draft amended due process petition	D.S.	\$485.00	1.90	\$921.50
1/23/2019	Complete revisions to Due Process Petition; work with L. Quartarolo to finalize same; draft email to client sending same	D.S.	\$485.00	3.90	\$1,891.50
1/23/2019	Work on brief in opposition to Motion to Dismiss and in support of Cross-Motion to Amend	D.S.	\$485.00	.60	\$291.00
1/24/2019	Draft Statement of Facts for brief in opposition to motion to dismiss	D.S.	\$485.00	1.70	\$824.50
1/25/2019	TC and email with SGreenwald re: 2015 documents	L.Q.	\$440.00	.20	\$88.00
1/25/2019	Research expert witness disqualification	L.Q.	\$440.00	2.50	\$1,100.00
1/25/2019	Review/respond to client email	D.S.	\$485.00	.30	\$145.50
1/25/2019	Review revisions to brief, and further attention to same	D.S.	\$485.00	1.70	\$824.50
1/26/2019	Work on Petition and Brief throughout day; emails with client	D.S.	\$485.00	6.00	\$2,910.00
1/27/2019	Telephone conference with client (D. A. ^{Privileged Attorney-CI} ^{Privileged Attorney-CI} ^{Privileged Attorney-CI} ^{Privileged Attorney-CI}) re: revisions to due process petition	D.S.	\$485.00	1.80	\$873.00
1/27/2019	Telephone conference with client (D. A. ^{Privileged Attorney-CI} ^{Privileged Attorney-CI} ^{Privileged Attorney-CI}) re: revisions to due process petition	D.S.	\$485.00	3.80	\$1,843.00

1/28/2019	Review client revisions and finalize due process petition	L.Q.	\$440.00	.70	\$308.00
1/28/2019	Finalize motion papers and upload for client delivery to Court; Email re: same	D.S.	\$485.00	4.30	\$2,085.50
1/28/2019	Phone calls with client re: printing and delivery of motion papers	D.S.	\$485.00	.40	\$194.00
2/4/2019	Attention to call from court re brief; discussion with DS re same	L.G.	\$220.00	.20	\$44.00
2/4/2019	Briefly review adversary's Reply Brief; draft email to client re: same	D.S.	\$485.00	.40	\$194.00
2/4/2019	Attention to motion to amend briefing.	J.D.R.	\$495.00	.50	\$247.50
2/5/2019	Preparing A Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Documents for Shipment.	S.D.	\$165.00	.20	\$33.00
2/5/2019	Review District response (.3) and internal discussion of next steps	L.Q.	\$440.00	.50	\$220.00
2/5/2019	Attention to preparing documents for submission to OAL via USPS; phone call with DS as to same; FileShare and Sharepoint issues (resolved)	L.G.	\$220.00	.50	\$110.00
2/5/2019	Further attention to motion to amend; strategy; client communications.	J.D.R.	\$495.00	1.50	\$742.50
2/12/2019	Emails and investigation as to whether Court Conference will go forward in light of storm	D.S.	\$485.00	.30	\$145.50
2/14/2019	Prepare status memo for client, including analysis of District's reply brief	D.S.	\$485.00	1.20	\$582.00
2/25/2019	Review motion papers in preparation for call with Court	D.S.	\$485.00	1.40	\$679.00

2/25/2019	Final preparation for call with Court; participate in call with Court	D.S.	\$485.00	.80	\$388.00
2/25/2019	Review recording of Status Call	D.S.	\$485.00	.10	\$48.50
2/25/2019	Attend to follow-up of status call	D.S.	\$485.00	.20	\$97.00
2/25/2019	Prepare call summary and email to client	D.S.	\$485.00	1.50	\$727.50
2/25/2019	Phone call from J. Lavery to discuss email issue	D.S.	\$485.00	.20	\$97.00
2/26/2019	Strategy for settlement discussions	L.Q.	\$440.00	.20	\$88.00
3/15/2019	Detailed analysis of Transcript and attention to settlement proposals	D.S.	\$485.00	2.40	\$1,164.00
3/18/2019	Attention to GPA calculations and accuracy of transcript	L.Q.	\$440.00	.50	\$220.00
3/20/2019	Continued attention to GPA calculation and transcript	L.Q.	\$440.00	.50	\$220.00
4/25/2019	Correspondence with opposing counsel.	J.D.R.	\$495.00	.50	\$247.50
4/25/2019	Attention to strategy; legal research with client re same; correspondence with client re same.	J.D.R.	\$495.00	2.50	\$1,237.50
4/25/2019	Review Opinion on Motion for Summary Decision	D.S.	\$485.00	.50	\$242.50
4/25/2019	Confer internally re; MSD Opinion and strategy for handling matter going forward	D.S.	\$485.00	.40	\$194.00

4/26/2019	Analyze Opinion and draft Memo to client, including a summary of the Opinion and an outline of potential ways to proceed	D.S.	\$485.00	1.90	\$921.50
4/26/2019	Review J. Rue Memo; confer internally re: strategy for handling matter; finalize client memo and send same	D.S.	\$485.00	.60	\$291.00
4/26/2019	Attention to status memorandum to client.	J.D.R.	\$495.00	1.30	\$643.50
5/6/2019	Review email from client; attend to strategy for response; draft brief response to client email	D.S.	\$485.00	.90	\$436.50
5/6/2019	Phone call with D. A. <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small>	D.S.	\$485.00	1.40	\$679.00
5/6/2019	Review Answer; review motion for reconsideration; email to client	D.S.	\$485.00	.50	\$242.50
5/6/2019	Fax to Court re Objection to Request for Reconsideration.	S.D.	\$165.00	.20	\$33.00
5/9/2019	Email from adversary; draft email to client with analysis of adversary's request; exchange emails with client, court and adversary	D.S.	\$485.00	.40	\$194.00
5/17/2019	Review email from Court; draft email to client	D.S.	\$485.00	.30	\$145.50
5/20/2019	Review correspondence with client re: settlement	L.Q.	\$440.00	.10	\$44.00
5/20/2019	Review client email; email to adversary/court; review J. Rue email; multiple emails re: scheduling	D.S.	\$485.00	.30	\$145.50
5/22/2019	Analyze grade issues;prepare GPA calculations	D.S.	\$485.00	1.00	\$485.00
5/23/2019	Further attendtion to analysis of grade issues; attend to scheduling issues	D.S.	\$485.00	.70	\$339.50

5/29/2019	Email re: scheduling	D.S.	\$485.00	.10	\$48.50
5/30/2019	Attention to settlement conference confirmation re: Sept 2019 dates	L.Q.	\$440.00	.10	\$44.00
5/31/2019	Draft email re: scheduling	D.S.	\$485.00	.10	\$48.50
5/31/2019	Additional emails re: scheduling	D.S.	\$485.00	.10	\$48.50
6/4/2019	Review email from Court; draft email to client	D.S.	\$485.00	.10	\$48.50
6/10/2019	Further client communications re strategy.	J.D.R.	\$495.00	1.50	\$742.50
6/10/2019	Phone call from D. A. <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small>	D.S.	\$485.00	.40	\$194.00
6/11/2019	Review/revise draft email to client re: options and recommendation	D.S.	\$485.00	.40	\$194.00
6/18/2019	Prepare for client call; confernce call with client	D.S.	\$485.00	1.30	\$630.50
6/18/2019	Further attention to case strategy and client advice; email re same.	J.D.R.	\$495.00	2.50	\$1,237.50
8/30/2019	Telephone call from D. A. <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small>	D.S.	\$485.00	.50	\$242.50
9/6/2019	Phone call from D. A. <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small>	D.S.	\$485.00	.50	\$242.50
9/27/2019	Phone call from D. A. <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small>	D.S.	\$485.00	.50	\$242.50

10/3/2019	Draft proposed settlement letter, including analysis of transcripts and identifying basis for proposed grade changes	D.S.	\$485.00	1.60	\$776.00
10/3/2019	Draft email to client re: scheduling	D.S.	\$485.00	.20	\$97.00
10/4/2019	Review email traffic related to scheduling and handling; attend to strategy for future handling	D.S.	\$485.00	.40	\$194.00
10/7/2019	Review/respond to client email	D.S.	\$485.00	.10	\$48.50
10/7/2019	Attention to settlement communication and calendar dates	L.Q.	\$440.00	.10	\$44.00
10/7/2019	Review/respond to client email	D.S.	\$485.00	.10	\$48.50
10/7/2019	Attend to strategy for handling	D.S.	\$485.00	.10	\$48.50
10/7/2019	Email to Court and Counsel re: scheduling	D.S.	\$485.00	.10	\$48.50
10/16/2019	Review email from adversary; draft email to client re: same; draft brief reply to adversary	D.S.	\$485.00	.30	\$145.50
11/25/2019	Call from Court, E-Mail to Don.	S.D.	\$165.00	.10	\$16.50
12/10/2019	Review letter from D.A.	J.D.R.	\$495.00	.20	\$99.00
12/10/2019	Review file and draft detailed follow-up email to client	D.S.	\$485.00	.40	\$194.00
12/10/2019	Review client's responsive email	D.S.	\$485.00	.10	\$48.50

12/12/2019	Respond to letter from D.A.	J.D.R.	\$495.00	.40	\$198.00
12/16/2019	Review/Format/Upload Notice, Updating Case Tracking/Trial Calendar.	S.D.	\$165.00	.20	\$33.00
12/23/2019	Review status of file, including recent voicemail, and draft email to clients	D.S.	\$485.00	.40	\$194.00
1/8/2020	Call from Pettineo, Fwd to Don.	S.D.	\$165.00	.10	\$16.50
1/8/2020	Draft email to client re: status conference strategy	D.S.	\$485.00	.20	\$97.00
1/8/2020	Prepare for status call with Court; status call with Court and adversary	D.S.	\$485.00	.30	\$145.50
1/16/2020	Draft email to client re: authority for dismissal, including file review re: same	D.S.	\$485.00	.30	\$145.50
1/16/2020	Review/Format/Upload Correspondence, Filing Paper Copy.	S.D.	\$165.00	.10	\$16.50
1/20/2020	Draft email to client re: confirmation of authorization for dismissal and client's phone call	D.S.	\$485.00	.30	\$145.50
1/27/2020	Attention A <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small> re litigation strategy.	K.W.	\$275.00	.50	\$137.50
2/17/2020	Document review re dismissal order.	K.W.	\$275.00	1.00	\$275.00
2/20/2020	Attention document review re case docket.	K.W.	\$275.00	1.00	\$275.00
3/10/2020	Attend to strategy for appeal	D.S.	\$485.00	.10	\$48.50

3/12/2020	Document review re A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	complaint.	K.W.	\$275.00	2.00	\$550.00
3/12/2020	Legal research re A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	complaint.	K.W.	\$275.00	2.00	\$550.00
3/13/2020	Attention to Distinguishing Current Electronic Case Files.		S.D.	\$165.00	.80	\$132.00
3/13/2020	Legal research re A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	complaint.	K.W.	\$275.00	2.00	\$550.00
3/13/2020	Draft A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	complaint.	K.W.	\$275.00	2.00	\$550.00
3/16/2020	Draft A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	complaint.	K.W.	\$275.00	4.00	\$1,100.00
3/17/2020	Draft A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	' complaint.	K.W.	\$275.00	3.00	\$825.00
3/17/2020	E-Mail from Don, Working on Sharepoint Directory for Client's Files.		S.D.	\$165.00	1.10	\$181.50
3/17/2020	Working on Sharepoint Files Directory cont.		S.D.	\$165.00	.50	\$82.50
3/17/2020	Review/revise draft Preliminary Statement for Complaint; emails re: same		D.S.	\$485.00	1.60	\$776.00
3/17/2020	Attention A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	file clean-up.	K.W.	\$275.00	.25	\$68.75
3/18/2020	Draft A Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle Privileged Attorney-Cle	complaint.	K.W.	\$275.00	3.00	\$825.00
3/20/2020	Attention to filing calendar.		K.W.	\$275.00	.50	\$137.50

4/8/2020	Correspondence re draft complaint.	K.W.	\$275.00	.50	\$137.50
4/8/2020	Review/revise draft Complaint	D.S.	\$485.00	5.70	\$2,764.50
4/15/2020	Review draft complaint and revise same	D.S.	\$485.00	.90	\$436.50
4/16/2020	Update causes of action in DNJ complaint per J. Rue Comments; related research	D.S.	\$485.00	2.90	\$1,406.50
4/20/2020	Correspondence with clients re review of complaint.	K.W.	\$275.00	.50	\$137.50
4/20/2020	Make additional changes based on J. Rue comments and forward to client for approval	D.S.	\$485.00	.50	\$242.50
4/28/2020	E-Filing Federal Appeal of Due Process Petition.	S.D.	\$165.00	.60	\$99.00
4/28/2020	E-Filing Federal Appeal cont.	S.D.	\$165.00	.10	\$16.50
4/28/2020	Review/Format/Upload Docket Entry re Federal Complaint, Fwd to John, Updating Case Tracking.	S.D.	\$165.00	.20	\$33.00
4/28/2020	Finalize Complaint, including redaction and finalizing exhibits; draft CCS; forward documents for filing	D.S.	\$485.00	3.20	\$1,552.00
4/29/2020	Review/Format/Upload Docket Entry/Notices re Summons/Filings/Judge Assignment, Updating Case Tracking, Fwd to John.	S.D.	\$165.00	.10	\$16.50
6/2/2020	Draft Acknowledgment of Service.	K.W.	\$275.00	1.00	\$275.00
6/2/2020	Review draft Ack of Service; draft proposed email re: same	D.S.	\$485.00	.50	\$242.50

6/15/2020	E-Filing Acknowledgment of Service re Appeal Complaint/Summons, Updating Calendar/Case Tracking re Answer Deadline.	S.D.	\$165.00	.20	\$33.00
6/15/2020	Review Ack of Service; draft assignments related to same	D.S.	\$485.00	.20	\$97.00
6/15/2020	Review of materials sent by Wall.	J.D.R.	\$495.00	.50	\$247.50
6/15/2020	Review Rule 11 letter from adversary; preliminary analysis of same, including brief related research; draft project assignment for response to letter	D.S.	\$485.00	.60	\$291.00
6/15/2020	Review/Format/Upload Correspondence from Pettineo re Acknowledgment of Service of Summons and Complaint re Appeal, Fwd to Don/John/Kenneth, Filing Paper Copy.	S.D.	\$165.00	.20	\$33.00
6/15/2020	Attention to filing Acknowledgment of Service.	K.W.	\$275.00	.20	\$55.00
7/1/2020	Drafting Request for Entry of Default, Sending to Don.	S.D.	\$165.00	.90	\$148.50
7/1/2020	Draft project assignment: Request for Entry of Default	D.S.	\$485.00	.20	\$97.00
7/1/2020	Draft response to Rule 11 letter, including related research, and circulate for internal review	D.S.	\$485.00	2.20	\$1,067.00
7/1/2020	Review/revise draft Request for Entry of Default	D.S.	\$485.00	.60	\$291.00
7/2/2020	Preparing Certified Correspondence re Entry of Default/Rule 11 Sanctions to Pettineo, Leaving on Anne's Desk for Shipment.	S.D.	\$165.00	.40	\$66.00
7/2/2020	Review DNJ standing Orders re: potential extension of deadlines	D.S.	\$485.00	.40	\$194.00

7/2/2020	Review/Format/Upload Clerk's Entry of Default.	S.D.	\$165.00	.10	\$16.50
7/2/2020	Finalize/file Request for Entry fo Default; finalize/serve response to Rule 11 letter	D.S.	\$485.00	1.20	\$582.00
7/2/2020	Review/Format/Upload Docket Entry re Request for Entry of Default.	S.D.	\$165.00	.10	\$16.50
7/2/2020	Review letter to Pettineo re Rule 11.	K.W.	\$275.00	.20	\$55.00
7/3/2020	Review email correspondence re informing client of the appeal of the OAL decision on grades.	K.W.	\$275.00	.10	\$27.50
7/3/2020	Correspondence with clients re appeal update.	K.W.	\$275.00	.20	\$55.00
7/6/2020	Attention to preliminary issues and default.	J.D.R.	\$495.00	1.20	\$594.00
7/6/2020	Phone call with J. Rue re: strategy for response to Motion to Vacate	D.S.	\$485.00	.20	\$97.00
7/6/2020	Attention case strategy.	K.W.	\$275.00	.20	\$55.00
7/7/2020	Review/Format/Upload Docket Entries re Def. Motion to Vacate Default, Updating Calendar/Case Tracking.	S.D.	\$165.00	.30	\$49.50
7/8/2020	Updating Calendar/Case Tracking re Deadline to Oppose Motion Vacating Default.	S.D.	\$165.00	.20	\$33.00
7/8/2020	Attention to filing.	K.W.	\$275.00	.20	\$55.00
7/14/2020	Confer with F. Geier and K. Walk re: strategy for Motion for Default judgment	D.S.	\$485.00	.30	\$145.50

7/14/2020	Attention to litigation strategy.	K.W.	\$275.00	.35	\$96.25
7/15/2020	Video Conference with F. Geier and K. Walk re: Cross-Motion for Default Judgment; research re: rules related to service of process; draft detailed email with results of research for inclusion in brief; draft email with shell of brief to use as a model	D.S.	\$485.00	2.10	\$1,018.50
7/15/2020	Correspondence re legal research.	K.W.	\$275.00	.50	\$137.50
7/16/2020	Review/revise draft of Point I of brief	D.S.	\$485.00	4.70	\$2,279.50
7/16/2020	Draft Statement of Facts for Cross Motion.	K.W.	\$275.00	2.00	\$550.00
7/16/2020	Attention to Cross Motion.	K.W.	\$275.00	.20	\$55.00
7/16/2020	Draft Part 1 of Opposition to Motion to Vacate Default and Cross Motion for Default Judgment	F.X.G.	\$385.00	1.50	\$577.50
7/17/2020	Follow up on open projects	D.S.	\$485.00	.10	\$48.50
7/17/2020	Attention to Cross Motion.	K.W.	\$275.00	.20	\$55.00
7/17/2020	Review/revise draft brief in support of default judgment	D.S.	\$485.00	1.70	\$824.50
7/17/2020	Draft Part 2 for Cross Motion.	K.W.	\$275.00	4.00	\$1,100.00
7/20/2020	Attention to opposition to motion to vacate default.	J.D.R.	\$495.00	2.90	\$1,435.50

7/20/2020	Work on cross-motion for default judgment	D.S.	\$485.00	1.50	\$727.50
7/20/2020	Complete intermediate draft of brief and circulate for internal review; email to K. Walk re: information needed for Statement of Facts	D.S.	\$485.00	1.20	\$582.00
7/20/2020	Work on Cross-Motion for default judgment, including incorporating J. Rue changes, updated Statement of Facts, and finalizing all motion papers	D.S.	\$485.00	3.40	\$1,649.00
7/20/2020	File Cross Motion.	K.W.	\$275.00	4.00	\$1,100.00
7/20/2020	Correspondence re filing Cross Motion.	K.W.	\$275.00	1.00	\$275.00
7/20/2020	Drafted insert for Brief in opposition to motion to vacate default and Cross Motion for Default Judgment	F.X.G.	\$385.00	.75	\$288.75
7/21/2020	Preparing Courtesy Copies of Cross Motion for Judges cont., CC to Pettineo (no encl.), Sending Courtesy Copies.	S.D.	\$165.00	.20	\$33.00
7/21/2020	Review/Format/Upload Docket Entries re Cross Motion for Default Judgment, Fwd to John/Kenneth/Geier, Preparing Courtesy Copy for Judge Wolfson, CC to Judge Quraishi.	S.D.	\$165.00	.70	\$115.50
7/21/2020	Review/Format/Upload Docket Notice Scheduling Cross-Motion, Updating Calendar/Case Tracking.	S.D.	\$165.00	.20	\$33.00
7/23/2020	Draft email to client with briefs and recommendations	D.S.	\$485.00	.60	\$291.00
7/28/2020	Review/Format/Uplaod Docket Entry re Reply Brief re Motion to Vacate Default.	S.D.	\$165.00	.10	\$16.50
7/29/2020	Drafted sur-reply to Defendant's reply to Opposition to Motion to Vacate Default and Cross Motion for Default Judgment	F.X.G.	\$385.00	1.50	\$577.50

7/29/2020	Review/review draft reply brief; related research	D.S.	\$485.00	1.70	\$824.50
7/30/2020	Drafted letter to Judge requesting leave to file sur-reply to Defendant's reply brief to Opposition to Motion to Vacate Default and Cross-Motion for Default Judgment	F.X.G.	\$385.00	1.00	\$385.00
7/30/2020	Work on motion for leave to file a reply	D.S.	\$485.00	.90	\$436.50
7/30/2020	Phone call with F. Geier re: Mtn for Leave to file a Reply; email re: same	D.S.	\$485.00	.20	\$97.00
7/30/2020	Work on reply brief on cross-motion for default judgment	D.S.	\$485.00	.60	\$291.00
9/28/2020	Review Opinion & Order entered by the Court; draft email to clients re: same	D.S.	\$485.00	.30	\$145.50
10/5/2020	Review/Format/Upload Docket Entries re Answer to Complaint/Order re Scheduling Teleconference, Fwd to John, Updating Calendar/Case Tracking.	S.D.	\$165.00	.30	\$49.50
10/22/2020	Draft Proposed Joint Discovery Plan	D.S.	\$485.00	1.70	\$824.50
11/3/2020	Review adversary's comments to proposed joint discovery plan; revise same and draft email to adversary re: same	D.S.	\$485.00	.40	\$194.00
11/3/2020	Draft status email to client, including file review	D.S.	\$485.00	.30	\$145.50
11/9/2020	Check in on status; draft follow-up email to client	D.S.	\$485.00	.20	\$97.00
11/10/2020	Draft follow-up email to client	D.S.	\$485.00	.10	\$48.50
11/11/2020	Follow up with adversary on comments to proposed joint discovery plan	D.S.	\$485.00	.30	\$145.50

11/11/2020	Finalize/file Proposed Joint Discovery Plan	D.S.	\$485.00	.40	\$194.00
11/12/2020	Review/Format/Upload Docket Entry re Joint Discovery Plan.	S.D.	\$165.00	.10	\$16.50
11/12/2020	Checking Magistrate Judge Quraishi's Judicial Preferences re Courtesy Copies, E-Mail to Don re Courtesy Copies/Judicial Preferences.	S.D.	\$165.00	.10	\$16.50
11/19/2020	Review/Format/Upload Docket Notices re Minute Entry/Text Order, Updating Calendar/Case Tracking.	S.D.	\$165.00	.10	\$16.50
11/19/2020	Prepare for Rule 16 Conference, including review of proposed stipulated facts and outline for discussion; participate in Rule 16 Conference	D.S.	\$485.00	1.00	\$485.00
11/19/2020	Draft update email to client	D.S.	\$485.00	.30	\$145.50
11/23/2020	Draft email to client re: first part of settlement proposal	D.S.	\$485.00	.40	\$194.00
12/9/2020	Call to Client re Schedule Phone Conference w Don.	S.D.	\$165.00	.10	\$16.50
12/10/2020	E-Mail from Don re Client Call, Follow-up Call to Client re Schedule Call w Don, E-Mail to Don re Client Call/E-Mail.	S.D.	\$165.00	.20	\$33.00
12/21/2020	Emails to/from client	D.S.	\$485.00	.20	\$97.00
12/28/2020	Analyze new transcript and add to chart; create chart of potential grade changes and draft email to client re: same	D.S.	\$485.00	1.10	\$533.50
12/30/2020	Review/Format/Upload Docket Entry re Letter re Dismissal/Text Order re Status Teleconference, Fwd to John, Updating Calendar/Case Tracking.	S.D.	\$165.00	.20	\$33.00
12/30/2020	Review/review draft email to client	D.S.	\$485.00	.20	\$97.00

1/6/2021	Phone call from client	D.S.	\$485.00	.10	\$48.50
1/6/2021	Review information provided by client; work on settlement letter	D.S.	\$485.00	3.00	\$1,455.00
1/8/2021	Work on settlement position letter	D.S.	\$485.00	.40	\$194.00
1/8/2021	Phone call with client re: settlement position; final preparation for court conference; court conference	D.S.	\$485.00	1.50	\$727.50
1/8/2021	Review client comments on letter; finalize and serve same; draft email to client	D.S.	\$485.00	1.00	\$485.00
1/8/2021	Review docket entries; draft letter to Magistrate; attention to filing same	D.S.	\$485.00	.50	\$242.50
1/11/2021	Review/Format/Upload Docket Notices/Entries re Minute Entry/Test Order/Soutar Letter, Call to Don re Text Order Deadline.	S.D.	\$165.00	.10	\$16.50
1/11/2021	Phone call with D. A. [REDACTED] to discuss GPA and other issues with 2019 transcript; follow-up email re: same	D.S.	\$485.00	1.20	\$582.00
1/25/2021	Exchange emails with adversary re: prospects for settlement	D.S.	\$485.00	.10	\$48.50
1/26/2021	Draft status email to client	D.S.	\$485.00	.20	\$97.00
1/26/2021	Exchange emails with client re: settlement	D.S.	\$485.00	.10	\$48.50
1/28/2021	Prepare for and participate in status call with Court; draft email to client, summarizing status call and recommending settlement counter-offer	D.S.	\$485.00	.80	\$388.00
1/29/2021	Attend to GPA calculations and settlement analysis	D.S.	\$485.00	.70	\$339.50

2/25/2021	E-Mail to Don re GPA Analysis Assignment.	S.D.	\$165.00	.10	\$16.50
3/8/2021	Draft email to client, following up on request for settlement proposal; draft email to adversary	D.S.	\$485.00	.50	\$242.50
3/17/2021	Review/respond to client email, including finalizing chart of settlement proposal	D.S.	\$485.00	.40	\$194.00
3/18/2021	Review/Format/Upload Docket Notice/Text Order re Minute Entry/Cross Motions, Updating Calendar/Case Tracking.	S.D.	\$165.00	.10	\$16.50
3/26/2021	Draft follow-up email to client re: settlement counter-proposal	D.S.	\$485.00	.10	\$48.50
4/8/2021	Draft Motion for Summary Judgement; work on stipulated facts	D.S.	\$485.00	2.50	\$1,212.50
4/8/2021	Finalize Stipulation of Facts and draft email transmitting same	D.S.	\$485.00	.30	\$145.50
4/8/2021	Review/revise draft brief and SOMF; draft assignments for paralegal	D.S.	\$485.00	5.00	\$2,425.00
4/9/2021	Researching, drafting, and refining SJ brief.	J.D.R.	\$495.00	4.40	\$2,178.00
4/9/2021	Review/Format/Upload Docket Entry re Stipulation of Facts, Fwd to John.	S.D.	\$165.00	.10	\$16.50
4/9/2021	Attention to Don's E-Mail re Motion for Summary Judgment, Drafting Notice of Motion/Soutar Certification/Proposed Order, Working on Citations in Statement of Undisputed Facts.	S.D.	\$165.00	1.00	\$165.00
4/9/2021	Working on Statement of Undisputed Facts cont., Working on Brief Citations/Table of Authorities, E-Mail to Don, Call from John re Brief.	S.D.	\$165.00	.70	\$115.50

4/9/2021	Complete intermediate draft of brief and circulate for internal review	D.S.	\$485.00	.30	\$145.50
4/9/2021	Review/review/finalize draft motion papers and file same	D.S.	\$485.00	3.50	\$1,697.50
4/12/2021	Review/Format/Upload Docket Entries/Notice re Motions for Summary Judgment, Updating Calendar/Case Tracking, Fwd to John.	S.D.	\$165.00	.30	\$49.50
4/16/2021	Legal research and drafting opposition to MSJ.	J.D.R.	\$495.00	4.40	\$2,178.00
4/16/2021	Internal communications re: strategy and handling	D.S.	\$485.00	.10	\$48.50
4/18/2021	Further attention to research and drafting opposition to MSJ.	J.D.R.	\$495.00	2.90	\$1,435.50
4/19/2021	Finalizing brief in opp to MSJ.	J.D.R.	\$495.00	1.50	\$742.50
4/19/2021	Review/review brief; finalize same and finalize certification of service; file same	D.S.	\$485.00	1.90	\$921.50
4/20/2021	Review/Format/Upload Docket Entries re Briefs in Opposition to Summary Judgments, Fwd to John.	S.D.	\$165.00	.10	\$16.50
4/20/2021	Drafting Notice of Appearance for John, Sending to Don.	S.D.	\$165.00	.30	\$49.50
4/25/2021	Draft Reply Brief	D.S.	\$485.00	1.50	\$727.50
4/26/2021	Review and revise reply brief.	J.D.R.	\$495.00	1.50	\$742.50
4/26/2021	Work on draft Reply Brief; draft Reply Certification; Draft Certification of Service	D.S.	\$485.00	3.90	\$1,891.50

4/26/2021	Incorporate J. Rue comments to brief; finalize and file same	D.S.	\$485.00	.80	\$388.00
4/27/2021	Review/Format/Upload Docket Entry re Motion for Summary Judgement Reply Briefs, Fwd to John, E-Mail to John/Don re Sealed Documents.	S.D.	\$165.00	.10	\$16.50
4/28/2021	Review/Format/Upload Defendant Reply Brief re Motion for Summary Judgment, Fwd to John.	S.D.	\$165.00	.10	\$16.50
6/29/2021	Review/Format/Upload Docket Notice re Judge Reassignment, Updating Case Tracking.	S.D.	\$165.00	.10	\$16.50
11/19/2021	Attention to DNJ decision; strategy and planning.	J.D.R.	\$495.00	2.50	\$1,237.50
11/19/2021	Preliminary attention to transition issues.	J.D.R.	\$495.00	1.10	\$544.50
11/22/2021	Review Opinion & Order from DNJ; internal phone calls and emails re: same	D.S.	\$485.00	1.40	\$679.00
11/24/2021	Review/Format/Upload Docket Notice re Case Terminated, Updating Case Tracking/Calendar re Fee Application/Case Status.	S.D.	\$165.00	.10	\$16.50
11/29/2021	Review draft email/correspondence to clients re transition of counsel and legal advice and strategy in case going forward; legal analysis re same.	R.T.	\$485.00	.30	\$145.50
11/29/2021	Draft summary for client	D.S.	\$485.00	.70	\$339.50
11/30/2021	Prepare Appearance on behalf of plaintiff; file and serve via ECF.	R.T.	\$485.00	.20	\$97.00
11/30/2021	Develop case strategy and legal analysis of fee petition and strategy re settlement	R.T.	\$485.00	1.10	\$533.50
11/30/2021	Receive and review correspondence to Wall Twp counsel re status of fee petition and settlement potential; legal analysis re	R.T.	\$485.00	.20	\$97.00

same.

11/30/2021	Complete draft email to client; meeting to discuss open issues and strategy for moving forward	D.S.	\$485.00	.90	\$436.50
11/30/2021	Attention to fee demand.	J.D.R.	\$495.00	.50	\$247.50
12/1/2021	Review/Format/Upload Docket Entry re Thurston Notice of Appearance, Fwd to John.	S.D.	\$165.00	.10	\$16.50
12/2/2021	Review accounting and other billing information in preparation of fee application	R.T.	\$485.00	1.10	\$533.50
12/3/2021	Prepare Exhibit A re omnibus agreement and case strategy; legal strategy conference and case file discussion.	R.T.	\$485.00	.40	\$194.00
12/3/2021	Legal strategy and discussion re transition of case and remand issues.	R.T.	\$485.00	.20	\$97.00
12/3/2021	Receive and review via email file transfer memo; legal analysis re status of file and update tasks.	R.T.	\$485.00	.40	\$194.00
12/3/2021	Legal analysis re claims and strategy discussion with co-counsel.	R.T.	\$485.00	.40	\$194.00
12/7/2021	Correspondence exchange and legal analysis re status of pro forma on fees for settlement demand.	R.T.	\$485.00	.30	\$145.50
12/7/2021	Review billings in preparation for pro forma for both settlement discussion and fee petition as necessary; begin preparation of consolidated pro form fees.	R.T.	\$485.00	1.40	\$679.00
12/7/2021	Receive and review via email supplemental pro forma billing information to update settlement demand and potential fee petition.	R.T.	\$485.00	.50	\$242.50
12/8/2021	Continued review of billings in preparation for pro forma for both settlement discussion and fee petition as necessary; amend and supplement preparation of	R.T.	\$485.00	.60	\$291.00

consolidated pro forma fees; email to co-counsel for review and comment.

12/9/2021	Amend and supplement pro forma with redactions and other legal protections for purposes of settlement; email JRA re same.	R.T.	\$485.00	1.80	\$873.00
12/9/2021	Receive and review via email correspondence with settlement demand to district counsel and attaching redacted fees pro forma; analysis re same.	R.T.	\$485.00	.30	\$145.50
12/10/2021	Receive and review multiple correspondence re settlement discussions and tolling filing of fee petition pending negotiations; prepare letter application to Judge Wolfson for 30 day tolling of filing fee petition and proposed Order; receive and review objections of WTBOE counsel re language in proposed Order; amend proposed Order; file and serve via ECF.	R.T.	\$485.00	1.10	\$533.50
12/10/2021	Attention to fee demand; correspondence with adversary.	J.D.R.	\$495.00	1.20	\$594.00
12/10/2021	Attention to scheduling.	J.D.R.	\$495.00	.50	\$247.50
12/13/2021	Receive and review via ECF Order signed by Judge Wolfson granting tolling of fee petition filing by 30 days to 1/12/22; docket same and legal analysis.	R.T.	\$485.00	.20	\$97.00
12/13/2021	Review/Format/Upload Docket Entries re Fee Application Deadlines, Fwd to John, Updating Calendar/Case Tracking.	S.D.	\$165.00	.20	\$33.00
12/16/2021	Strategy meeting and legal discussing re status of case and file review.	R.T.	\$485.00	.30	\$145.50
12/16/2021	Received and review via email correspondence from WTBOE counsel re status of settlement negotiations and presentation to BOE.	R.T.	\$485.00	.10	\$48.50
12/16/2021	Receive and review via email correspondence to WTBOE counsel re settlement discussions.	R.T.	\$485.00	.10	\$48.50

12/16/2021	Email with adversary re settlement of fees.	J.D.R.	\$495.00	.30	\$148.50
12/19/2021	Prepare status report with legal analysis, strategy and advice.	R.T.	\$485.00	.50	\$242.50
12/28/2021	Multiple correspondence exchanges re fee petition and pro forma for purposes of filing in federal court	R.T.	\$485.00	.30	\$145.50
1/3/2022	Review file and prepare status report to JRA and file with next steps items	R.T.	\$485.00	.50	\$242.50
1/6/2022	Correspondence exchange and strategy discussion re fee application; legal analysis re same	R.T.	\$485.00	.30	\$145.50
1/6/2022	Attention to fee application deadline/correspondence re. same.	S.Q.E.	\$440.00	.40	\$176.00
1/7/2022	Continue preparation of fee petition	R.T.	\$485.00	.80	\$388.00
1/8/2022	Begin draft of fee application; review prior drafts and correspondence exchanges with co-counsel re strategy and legal advice	R.T.	\$485.00	1.50	\$727.50
1/10/2022	Attention to fee application materials.	J.D.R.	\$495.00	1.10	\$544.50
1/12/2022	JRA filings; Letter tolling fee petition; fee petition proposed order; Order Granted	C.W.	\$75.00	.40	\$30.00
1/13/2022	Attention to supporting certifications.	J.D.R.	\$495.00	.70	\$346.50
1/13/2022	JRA filings; Order Granted	C.W.	\$75.00	.20	\$15.00
2/9/2022	Attention to fee application.	J.D.R.	\$495.00	2.20	\$1,089.00

2/11/2022	JRA filings; Plaintiffs Notice of Motion; Memorandum of Law in Support of Plaintiffs Fee Petition; Certification-Rue/Thurston/Giles/Reisman; Proposed Order Granting Award	C.W.	\$75.00	.30	\$22.50
2/11/2022	Further attention to final fee application.	J.D.R.	\$495.00	.80	\$396.00
2/11/2022	Further attention to trial preparation, and carving out specific assignments for team members.	J.D.R.	\$495.00	3.30	\$1,633.50
2/11/2022	Attention to fee application filing/strategy re. next step/attention to pending client outreach/attention to courtesy copies to Judge Wolfson.	S.Q.E.	\$440.00	.70	\$308.00
2/11/2022	Attention to fee application filing/strategy re. next step/attention to pending client outreach/attention to courtesy copies to Judge Wolfson.	S.Q.E.	\$440.00	.70	\$308.00
2/14/2022	JRA filings; Docket Text Notice for Attorney Fees; email TN with date	C.W.	\$75.00	.20	\$15.00
3/21/2022	Attention to draft reply brief re fee application.	J.D.R.	\$495.00	1.20	\$594.00
7/18/2022	E-filing	T.M.N.	\$165.00	.20	\$33.00
7/19/2022	Update docket	T.M.N.	\$165.00	.20	\$33.00
7/28/2022	Attention to recent status conference/attention to next steps based on the same.	S.Q.E.	\$440.00	.40	\$176.00
8/11/2022	E-file	T.M.N.	\$150.00	.10	\$15.00
8/24/2022	Attention to correspondence re. 8/24/22 response from District re. settlement negotiations.	S.Q.E.	\$440.00	.30	\$132.00

8/30/2022	E-filing	T.M.N.	\$0.00	.30	\$0.00
9/26/2022	Attention to strategy re. settlement conference on 10/23/22.	S.Q.E.	\$440.00	.60	\$264.00
9/28/2022	Attention to case strategy/correspondence re. same.	S.Q.E.	\$440.00	.30	\$132.00
10/4/2022	Attention to preparation for settlement conference; client communications re same.	J.D.R.	\$495.00	1.50	\$742.50
10/4/2022	Attention to strategy and planning re settlement conference.	J.D.R.	\$495.00	1.00	\$495.00
10/4/2022	Attention to outreach to clients re. upcoming settlement conference/correspondence re. same.	S.Q.E.	\$440.00	.70	\$308.00
10/6/2022	Attention to client communications in advance of settlement conference.	J.D.R.	\$495.00	1.40	\$693.00
10/6/2022	Attention to strategy re. upcoming settlement conference.	S.Q.E.	\$440.00	.60	\$264.00
10/7/2022	Further attention to client communications re settlement conference.	J.D.R.	\$495.00	.40	\$198.00
10/7/2022	Attention to strategy re settlement; client communications.	J.D.R.	\$495.00	.80	\$396.00
10/11/2022	Attention to client outreach re. pending settlement conference.	S.Q.E.	\$440.00	.40	\$176.00
10/12/2022	Attention to client communications.	J.D.R.	\$495.00	.50	\$247.50
10/21/2022	Letter to client re case status.	J.D.R.	\$495.00	1.30	\$643.50

10/21/2022	Attention to drafting letter to M. A <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small> /correspondence re. same.	S.Q.E.	\$440.00	.60	\$264.00
10/25/2022	Letter to Judge Goodman re settlement conference; legal research re ethics issues.	J.D.R.	\$495.00	2.20	\$1,089.00
11/7/2022	Attention to client issues; settlement strategy.	J.D.R.	\$495.00	.80	\$396.00
11/7/2022	Attention to outreach to clients/call with D. A <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small> and M. A <small>Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI Privileged Attorney-CI</small> /internal meeting with J.R. and D.S. regarding same and next steps.	S.Q.E.	\$440.00	1.00	\$440.00
11/8/2022	Meeting to discuss settlement issues; efforts to reach client; preparation for and follow-up to same.	J.D.R.	\$495.00	1.50	\$742.50
11/8/2022	Attention to and prep for internal meeting re. 12/5/22 settlement conference and pending meeting with clients re. same.	S.Q.E.	\$440.00	.50	\$220.00
11/9/2022	Attention to client communications re settlement conference.	J.D.R.	\$495.00	.50	\$247.50
11/9/2022	Communications with client and SE re case issues	M.A.	\$82.50	1.00	\$82.50
11/9/2022	Attention to client research re. 11/14 status conference/correspondence re. same.	S.Q.E.	\$440.00	.70	\$308.00
11/10/2022	Attention to client communications re settlement conference; attention to negotiation strategy.	J.D.R.	\$495.00	1.50	\$742.50
11/10/2022	Attention client meeting/correspondence re. same/attention to strategy re. pending settlement discussions with the district/pending 11/14/22 status conference.	S.Q.E.	\$440.00	1.20	\$528.00
11/10/2022	Consultation with lead attorney re client and settlement issues	M.A.	\$82.50	1.00	\$82.50

11/10/2022	Consultation with client	M.A.	\$82.50	.50	\$41.25
SUBTOTAL:			416.15		\$173,179.50

Costs

4/28/2020	PACER; Filing Fee re Complaint Appealing OAL Decision.	\$400.00
7/6/2020	Certified mail payment.	\$7.10
7/21/2020	Neopost; Postage re CCs of Cross-Motion to Judges Wolfson and Quraishi.	\$4.40
7/21/2020	Neopost; CC of Cross Motion Courtesy Copy Cover Letter to Pettineo.	\$0.50
SUBTOTAL:		\$412.00

Matter Ledgers

8/1/2022	Balance before last invoice	\$0.00
8/1/2022	(Adjustment) Previous balance	\$0.00
SUBTOTAL:		\$0.00

Trust Account

11/10/2022	Previous Balance	\$0.00
Available in Trust:		\$0.00

TOTAL \$173,591.50

PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$173,591.50



Thurston Law Offices LLC
100 Springdale Rd A3
PMB 287
Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/6/2022	2236

EXHIBIT B

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	
Project	

Due Date
2/6/2022

Items struck in red are already included in JRA bills

Service Date	Description	Time	Amount
1/3/2022	Review file and prepare status report to JRA and file with next steps items;	0.5	242.50
1/6/2022	Correspondence exchange and strategy discussion re fee application; legal analysis re same;	0.3	145.50
1/7/2022	Continue preparation of fee petition;	0.8	388.00
1/8/2022	Begin draft of fee application; review prior drafts and correspondence exchanges with co-counsel re strategy and legal advice;	1.5	727.50
1/9/2022	Continue preparation of fee application; review file and forms for compliance with local rules;	1.6	776.00
1/9/2022	Legal research and begin draft of fee petition; strategy discussion and legal analysis re scope of petition, necessary supporting certifications and documents, and related issues;	1.1	533.50
1/10/2022	Extensive strategy discussion and legal analysis re fee petition, tolling of time to file, settlement position, and interaction with WTBOE counsel;	2.2	1,067.00
1/10/2022	Prepare letter application to Court re extension of time / tolling of time to file fee petition; correspondence exchanged with WTBOE re changes and approval of final version; file and serve same via ECF;	0.4	194.00
1/10/2022	Strategy discussion, legal research, and legal analysis re fee petition issues;	0.6	291.00
1/11/2022	Receive and review via ECF Order granting extension of time / tolling of time to file fee petition; email to co-counsel re same and legal analysis;	0.2	97.00
1/13/2022	Multiple correspondence exchanges and draft fee petition certifications re filing fee petition;	0.5	242.50
1/17/2022	Legal strategy discussion re fee application certifications and status of application;	0.2	97.00
1/25/2022	Strategy discussion re status of settlement negotiations and fee petition and legal advice re same;	0.3	145.50
		Total	\$4,947.00



Thurston Law Offices LLC
100 Springdale Rd A3
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Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/9/2022	2257

Bill To	Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230
Project	

Due Date
2/9/2022



Thurston Law Offices LLC
100 Springdale Rd A3
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Cherry Hill NJ 08003

Invoice

Date	Invoice #
3/1/2022	2261

Bill To

Micayla Augustyn
c/o JOHN RUE & ASSOCIATES
1 Fairview Ave, Ste 14
Phillipsburg, NJ 08865-1230

Due Date
3/1/2022



Thurston Law Offices LLC
100 Springdale Rd A3
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Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/3/2022	2277

Bill To

Micayla Augustyn
c/o JOHN RUE & ASSOCIATES
1 Fairview Ave, Ste 14
Phillipsburg, NJ 08865-1230

Due Date
4/3/2022

Project

Service Date	Description	Time	Amount
3/8/2022	Receive and review via ECF WTBOE's response to Plaintiffs' fee petition; legal analysis re same;	1.2	630.00
3/9/2022	Strategy discussion and legal analysis with co-counsel re WTBOE opposition to fee petition and arguments re Palmer;	0.4	210.00
3/9/2022	Strategy discussion and legal analysis re WTBOE opposition and time to respond;	0.2	105.00
3/9/2022	Receive and review prior briefs and legal research from co-counsel in preparation for reply brief on fee application; legal analysis re same;	1.2	630.00
3/11/2022	Correspondence to WTBOE counsel requesting consent on extension of time to file reply in support of fee petition;	0.2	105.00
3/11/2022	Prepare letter application for extension of time to file reply in support of fee petition; file and serve same via ECF;	0.4	210.00
3/14/2022	Receive and review via ECF Order from Judge Wolfson granting ext time to file Reply in support of fee petition;	0.1	52.50
3/14/2022	Multiple correspondence re State Defendants' extension of time to respond to complaint and consent by Plaintiffs;	0.3	0.00
3/14/2022	Correspondence exchange with WTBOE counsel re application for extension of time;	0.2	105.00
3/14/2022	Begin draft reply in support of fee petition;	0.8	420.00
3/15/2022	Continue draft reply in support of fee petition;	0.9	472.50
3/16/2022	Continue draft reply in support of fee petition;	1	525.00
3/17/2022	Continue draft reply in support of fee petition; legal research re same; email draft to co-counsel for review and amendments;	1.2	630.00
3/18/2022	Review file and prepare status report;	0.4	210.00
3/21/2022	Amend and supplement Reply in support of Fee Petition; prepare for final; file and serve via ECF;	0.7	367.50



Thurston Law Offices LLC
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Invoice

Date	Invoice #
6/2/2022	2311

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	

Due Date
6/2/2022

Project	
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Service Date	Description	Time	Amount
5/5/2022	Review file and update status report;	0.2	105.00
		Total	\$105.00



Thurston Law Offices LLC
100 Springdale Rd A3
PMB 287
Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/3/2022	2338

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	
Project	

Due Date
8/3/2022

Service Date	Description	Time	Amount
7/12/2022	Receive and review via ECF Text Order scheduling status conference with Magistrate Judge Goodman for 7/18; legal analysis re same;	0.1	52.50
7/12/2022	Strategy discussion and legal analysis re 7/18 status conference with Judge Goodman;	0.2	105.00
7/14/2022	Multiple exchanges with WTBOE counsel re adjournment of 7/18/22 status conf; legal analysis re same;	0.4	0.00
7/15/2022	Receive and review via ECF Order rescheduling status conference with Magistrate Judge Goodman to 7/26/22; legal analysis re same;	0.1	52.50
7/15/2022	Receive and review via ECF letter from co-counsel to Judge Goodman requesting adjournment of 7/18/22 status conf;	0.1	0.00
7/25/2022	Conference call with co-counsel re strategy discussion in preparation for 7/26 status conference with Judge Goodman;	0.3	157.50
7/25/2022	Strategy discussions and legal analysis and email exchanges with co-counsel re status of case and preparation for status conference 7/26;	0.6	315.00
7/26/2022	Review file and prepare for status conference with Judge Goodman;	0.5	262.50
7/26/2022	Participate in status conference with Judge Goodman and re settlement; prepare report to co-counsel;	0.7	367.50
7/26/2022	Multiple email exchanges with co-counsel re settlement discussions, legal analysis, strategy, and client contact;	0.7	367.50
7/28/2022	Prepare for and participate in strategy discussions and legal analysis re settlement conference and client management re same;	0.6	315.00
7/29/2022	Receive and review via ECF Order from Judge Goodman re settlement conference and related rulings made during status conference; legal analysis re same;	0.2	105.00



Thurston Law Offices LLC
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Invoice

Date	Invoice #
9/12/2022	2349

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	Due Date
	9/12/2022

Project	
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Service Date	Description	Time	Amount
8/24/2022	Receive and review via email from Judge Goodman's chambers re settlement conference;	0.1	52.50
8/24/2022	Multiple email exchanges with WTBOE's counsel re settlement conference and negotiations by BOE; denial of adjournment of settlement conference and legal issues re same;	0.4	210.00
8/24/2022	Receive and review via ECF letter from WTBOE's counsel to Judge Goodman re settlement conference; legal analysis re same for response;	0.3	157.50
8/24/2022	Email exchange with co-counsel with legal strategy and discussion on response to WTBOE's counsel to Judge Goodman re settlement conference;	0.2	105.00
8/25/2022	Prepare lengthy letter to Judge Goodman re letter from WTBOE's counsel on settlement conference; file and serve same via ECF;	0.4	210.00
8/25/2022	Strategy discussion and legal analysis re settlement conference and WTBOE's position and response thereto;	0.2	105.00
8/25/2022	Receive and review via ECF text Order from Judge Goodman adjourning settlement conference without new date, reinstating fee petition, and setting deadline for WTBOE to state position on settlement conference; legal analysis re same;	0.1	52.50
		Total	\$892.50



Thurston Law Offices LLC
100 Springdale Rd A3
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Invoice

Date	Invoice #
9/28/2022	2358

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	
Project	

Due Date
9/28/2022

Service Date	Description	Time	Amount
9/21/2022	Receive and review email from co-counsel to Wall Twp BOE counsel re settlement conference;	0.1	52.50
9/21/2022	Strategy discussion and legal analysis re Wall Twp BOE counsel's letter to Court filed via ECF re settlement authority and settlement conference;	0.4	210.00
9/21/2022	Receive and review ECF Wall Twp BOE counsel's letter to Court re settlement authority and settlement conference;	0.3	157.50
9/26/2022	Receive and review via ECF Text Order scheduling Settlement Conference with Judge Goodman for 10/20; legal analysis re same;	0.2	105.00
9/26/2022	Strategy discussion and legal analysis re Text Order scheduling Settlement Conference with Judge Goodman for 10/20;	0.3	157.50
9/26/2022	Email to WTBOE counsel re adjourning Settlement Conference with Judge Goodman for 10/20;	0.1	52.50
9/27/2022	Email exchange with WTBOE counsel re adjournment of settlement conference;	0.1	52.50
9/27/2022	Prepare letter to Judge Goodman requesting adjournment of 10/20/22 Settlement Conference; file and serve same via ECF;	0.3	157.50
			Total
			\$945.00



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Invoice

Date	Invoice #
10/4/2022	2367

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	

Due Date
10/4/2022

Project	
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Service Date	Description	Time	Amount
9/29/2022	Email exchanges with WTBOE counsel re settlement conference and communication with court; legal analysis re same;	0.2	105.00
		Total	\$105.00



Thurston Law Offices LLC
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Invoice

Date	Invoice #
11/3/2022	2376

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	

Due Date
11/3/2022

Project	
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Service Date	Description	Time	Amount
10/4/2022	Strategy discussion and legal analysis re client input at settlement conference with Judge Goodman and preparation re same;	0.8	420.00
10/5/2022	Receive and review via ECF letter from WTBOE counsel to Judge Goodman re settlement conf; legal analysis re same;	0.2	105.00
10/6/2022	Receive and review via ECF Text Order from Judge Goodman rescheduling settlement conference to 12/5/22; legal analysis re same;	0.1	52.50
10/11/2022	Email discussion and strategy re settlement conference and client preparation;	0.2	105.00
10/25/2022	Receive and review via ECF letter from co-counsel to Judge Goodman re conflicts and issues related to settlement conference and request to resolve fee petition on papers; legal analysis re same;	0.3	157.50
10/25/2022	Email exchanges with WTBOE counsel re canceling settlement conference and allowing fee petition to be decided on papers; WTBOE refusal to so consent; legal analysis and strategy re same;	0.4	210.00
10/25/2022	Strategy discussion, legal analysis and email exchanges with co-counsel re ethics issues relating to settlement conference and draft letter to Judge Goodman re same;	0.7	367.50
10/26/2022	Strategy discussion and legal analysis re settlement conference rejection and position to Judge Goodman in status conference re conflict and ethical issues;	0.5	262.50
10/26/2022	Receive and review via ECF Text Order from Judge Goodman re status conference; legal analysis re same;	0.2	105.00
10/27/2022	Strategy discussion and legal analysis in preparation for status conference with Judge Goodman 11/4;	0.5	262.50
		Total	\$2,047.50



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Invoice

Date	Invoice #
11/23/2022	2383

Bill To	
Micayla Augustyn c/o JOHN RUE & ASSOCIATES 1 Fairview Ave, Ste 14 Phillipsburg, NJ 08865-1230	

Due Date
11/23/2022

Project	
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Service Date	Description	Time	Amount
11/3/2022	Receive and review via email communication from Judge Goodman's chambers re status conference;	0.1	52.50
11/4/2022	Prepare for and participate in status conference with Judge Goodman;	0.7	367.50
11/4/2022	Strategy discussion and legal analysis re Judge Goodman's comments during status conference on global settlement and nature of claims;	0.4	210.00
11/7/2022	Receive and review via ECF Text Order from Judge Goodman re 11/14 status conference as per 11/4 conference; legal analysis re same;	0.1	52.50
11/8/2022	Prepare for and participate in strategy discussion and legal analysis re settlement conference with Judge Goodman, conference with clients re same, and general settlement positions;	2.1	1,102.50
11/9/2022	Strategy discussion and legal analysis re client preparation for settlement conference and legal principles of converting non-monetary relief (grades) to monetary relief under 504;	1.2	630.00
11/10/2022	Strategy discussion and legal analysis re fee petition, settlement position, and client authority; update pro forma re same; email and telephone call to client re same;	2.7	1,417.50
11/10/2022	Telephone call to and email exchange with WTBOE counsel re meet and confer / settlement discussion as per instructions from Judge Goodman;	0.3	157.50
11/11/2022	Prepare for and participate in settlement call with WTBOE counsel as per Judge Goodman's instructions and in preparation for 11/14/22 status conference; review pro formas and filings re same;	1.4	735.00
11/11/2022	Strategy discussion and legal analysis re settlement discussions, Judge Goodman's status conf, and supplementation of fee petition;	0.8	420.00
11/11/2022	Email exchanges with client re settlement authority and preparation for status conference with Judge Goodman;	0.3	157.50
11/14/2022	Strategy discussion and legal analysis in preparation for settlement status conference with Judge Goodman;	0.5	262.50
11/14/2022	Prepare for and participate in conference call with Judge Goodman re status of settlement discussions and fee petition supplement;	0.6	315.00

	Total
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Thurston Law Offices LLC
100 Springdale Rd A3
PMB 287
Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/23/2022	2383

Bill To

Micayla Augustyn
c/o JOHN RUE & ASSOCIATES
1 Fairview Ave, Ste 14
Phillipsburg, NJ 08865-1230

Due Date
11/23/2022

Project

Service Date	Description	Time	Amount
11/14/2022	Strategy discussion and legal analysis post-status conference call with Judge Goodman and begin preparation of supplemental certification on fee petition;	0.4	210.00
11/15/2022	Receive and review via ECF text Order from Judge Goodman administratively terminating fee petition pending supplementation by Plaintiffs and schedule for opposition; legal analysis re same;	0.2	105.00
11/15/2022	Receive and review via email supplemental information for supplement to fee petition for court; legal analysis re same;	0.4	210.00
11/17/2022	Lengthy status report via email to client re 11/16 conference with Judge Goodman and settlement status;	0.4	210.00
11/23/2022	Prepare supplemental certification of RCT to amend and supplement fee petition; file and serve via ECF;	1.6	840.00